



**Northeast  
Nuclear Energy**

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The Northeast Utilities System

**OCT 16 1998**

Docket Nos. 50-336  
50-423

B17495

Re: 10CFR50.55(a)

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Millstone Nuclear Power Station, Unit Nos. 2 and 3  
Analytical Evaluation of Wall Thinning  
Alternative to Requirements of ASME Section XI

In accordance with 10CFR50.55a(a)(3)(i), Northeast Nuclear Energy Company (NNECO) hereby requests Nuclear Regulatory Commission (NRC) approval for the use of an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, IWA-4000 relating to the evaluation of a component where the section thickness has been reduced below the minimum design thickness.

ASME Boiler and Pressure Vessel Code Section XI, IWA-4000 provides the process for assessing a component for continued service after a defect has been removed. This provision stipulates that where the section thickness has been reduced below the minimum design thickness, the component shall be repaired. As an alternative, the component may be evaluated and accepted in accordance with the design rules of either the construction code or Section III.

As an alternative to the requirements of IWA-4000, NNECO proposes to use the provisions of ASME Boiler and Pressure Vessel Code Case N-597 for the analytical evaluation of Class 1, 2 and 3 carbon and low-alloy steel piping items subjected to wall thinning as a result of flow accelerated or other corrosion phenomena. Code Case N-597 was approved by ASME on March 2, 1998.

Presently, Code Case N-597 is not contained in the most recent listing of approved Code cases contained in Revision 11 of Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability - ASME Section XI, Division 1." However, the NRC has previously permitted the use of a similar Code Case (i.e. N-480) for carbon and low alloy steels at other facilities<sup>1</sup>. NNECO believes the use of Code Case N-

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<sup>1</sup> "Safety Evaluation By The Office Of Nuclear Reactor Regulation, Request To Use Code Case N-480 For Duke Power Company, Catawba Nuclear Station, Unit 1, Docket No. 40-413"

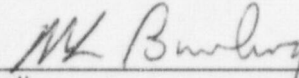
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597 to evaluate wall thinning will provide a level of safety and quality consistent with the requirements of Section XI, IWA-4000.

Should you have any questions regarding this matter, please contact Mr. H. Miller at (860) 440-0474.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



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Martin L. Bowling  
Recovery Officer - Technical Services

cc: H. J. Miller, Region I Administrator  
W. M. Dean, Director, Millstone Project Directorate  
W. D. Lanning, Director, Millstone Inspections  
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Attachment 1

Millstone Nuclear Power Station, Unit Nos. 2 and 3  
NNECO's Commitments

October 1998



Attachment  
List of Regulatory Commitments

The following table identifies those actions committed to by NNECO in this document. Please notify the Manager - Regulatory Compliance at the Millstone Nuclear Power Station Unit No. 3 of any questions regarding this document or any associated regulatory commitments.

Regulatory Commitment	Committed Date or Outage
There are no new regulatory commitments contained within this letter.	N/A